

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL No. 2327
THIS DOCUMENT RELATES TO THE CASES ON THE EXHIBITS ATTACHED HERETO	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

JOINT MOTION TO DISMISS WITHOUT PREJUDICE

Plaintiffs, whose cases are listed on the attached Exhibits A - B, and Defendants, Johnson & Johnson, Ethicon, Inc., and/or Ethicon LLC (collectively, the “Ethicon Defendants”), jointly move to dismiss without prejudice all claims against the Ethicon Defendants, pursuant to Fed. R. Civ. P. 41(a)(2). No other defendants remain. Therefore, the Ethicon Defendants respectfully request the Court close this case and strike it from the docket. Each party shall bear her or its own costs.

Respectfully submitted,

/s/ Marc D. Grossman
Marc D. Grossman
Sanders Viener Grossman
100 Herricks Road
Mineola, NY 11501
(516) 741-5252
mgrossman@thesandersfirm.com
Counsel for Plaintiffs

/s/ Charles Thomas Paglialunga
Charles Thomas Paglialunga
Paglialunga & Harris
1001 Fourth Avenue
Suite 3200

/s/ William M. Gage
William M. Gage (MS Bar #8691)
Butler Snow LLP
1020 Highland Colony Parkway
Suite 1400 (39157)
P.O. Box 6010
Ridgeland, MS 39158-6010
(601) 985-4561
william.gage@butlersnow.com

/s/ Susan M. Robinson
Susan M. Robinson (W. Va. Bar #5169)
Thomas Combs & Spann PLLC
300 Summers Street

Seattle, WA 98154
(206) 623-6696
chuck@phlawfirm.com
Counsel for Plaintiffs

Suite 1380 (25301)
P.O. Box 3824
Charleston, WV 24338
(304) 414-1800
srobinson@tcspllc.com
Counsel for the Ethicon Defendants

CERTIFICATE OF SERVICE

I certify that on this date I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

/s/ William M. Gage

EXHIBIT A
(Sanders Viener Grossman)

<u>Civil Action No.</u>	<u>Case Style</u>
2:14-cv-19544	Hollie Nairns v. Ethicon, Inc.; Johnson & Johnson
2:14-cv-20466	Alfreida Davis v. Ethicon, Inc.; Johnson & Johnson
2:14-cv-21954	Theresa Perry v. Ethicon, Inc.; Johnson & Johnson
2:14-cv-22093	Patsy Lopez v. Ethicon, Inc.; Johnson & Johnson
2:15-cv-09499	Dorothy Jenkins v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-00411	Sara Meyers v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-07966	Dreama Woodby v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-08009	Alesia Johnson v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-08074	Patricia Kelley v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-08289	Sabrina Bennett v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-11357	Sandra Duran v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-11995	Helena Leyden v. Ethicon, Inc.; Johnson & Johnson
2:16-cv-12658	Jennifer Blakeman v. Ethicon, Inc.; Johnson & Johnson

EXHIBIT B
(Paglialunga & Harris)

<u>Civil Action No.</u>	<u>Case Style</u>
2:15-cv-15554	Janet Detour v. Ethicon, Inc.
2:15-cv-15555	Beverly Goble v. Ethicon, Inc.
2:15-cv-15565	Linda Morehouse v. Ethicon, Inc.
2:16-cv-02837	Obdulia Cardoso, Deceased, and Maria Cardoso, as Executor of the Estate of Obdulia Cardoso, Deceased v. Ethicon, Inc.